

THE HONORABLE BENJAMIN H. SETTLE

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

ISELA M. MALDONADO, an individual,  
  
Plaintiff,

v.

COLUMBIA VALLEY EMERGENCY  
PHYSICIANS, LLC; EMCARE, INC.,  
EMCARE HOLDINGS INC., ENVISION  
HEALTHCARE HOLDINGS, INC., AND  
ENVISION HEALTHCARE  
CORPORATION,  
  
Defendants.

Case No. 3:20-CV-05428 BHS TLF

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE DEADLINE  
TO FILE ANSWER**

NOTE ON MOTION CALENDAR:  
SEPTEMBER 22, 2020

The parties in the above-captioned action, through their undersigned counsel, hereby  
STIPULATE AND AGREE as follows:

1. On April 1, 2020, Plaintiff Isela Maldonado filed a complaint in Thurston  
County Superior Court against Defendants Columbia Valley Emergency Physicians, LLC;  
EmCare Inc.; Emcare Holdings Inc.; Envision Healthcare Holdings, Inc.; and Envision  
Healthcare Corporation, bringing putative class claims for negligence, breach of implied  
contract, procedural unconscionability, and substantive unconscionability. The case was  
removed to this Court on May 6, 2020.

STIPULATION AND [PROPOSED] ORDER TO  
CONTINUE DEADLINE TO FILE ANSWER  
(Case No. 3:20-CV-05428 BHS TLF) - 1

LAW OFFICES  
**CALFO EAKES LLP**  
1301 SECOND AVENUE, SUITE 2800  
SEATTLE, WASHINGTON 98101-3808  
TEL (206) 407-2200 FAX (206) 407-2224

2. On September 9, 2020, this Court adopted the Report and Recommendation of Magistrate Judge Fricke and granted in part and denied in part Defendants' motion to dismiss the complaint.

3. The parties have conferred and agreed to seek a 14-day continuance of the deadline for Defendants to file an Answer, from September 23, 2020, to October 7, 2020.

4. This stipulation shall not operate as an admission of any factual allegation or legal conclusion, nor shall it operate as a waiver nor affect any right, defense, claim or objection.

*SO STIPULATED.*

Dated this 22nd day of September, 2020.

CALFO EAKES LLP

By: /s/ Angelo J. Calfo

Angelo Calfo, WSBA #27079  
Emily Dodds Powell, WSBA #49351  
1301 Second Ave, Suite 2800  
Seattle, WA 98101  
Tel: (206) 407-2210 / Fax: (206) 407-2224  
Email: [angeloc@calfoeakes.com](mailto:angeloc@calfoeakes.com)  
[emilyp@calfoeakes.com](mailto:emilyp@calfoeakes.com)

EPSTEIN BECKER GREEN

R. David Jacobs, CA Bar #73545  
Jonah D. Retzinger, CA Bar #326131  
Brock Seraphin, CA Bar #307041  
1925 Century Park East, Suite 500  
Los Angeles, CA 90067-2506  
Tel: 310.556.8861 |  
Fax: 310-553-2156  
Email: [DJacobs@ebglaw.com](mailto:DJacobs@ebglaw.com)  
[JRetzinger@ebglaw.com](mailto:JRetzinger@ebglaw.com)  
[BSeraphin@ebglaw.com](mailto:BSeraphin@ebglaw.com)

*Attorneys for Defendants*

McPARTLAND LAW OFFICES

By: /s/ Bryce P. McPartland

Bryce P. McPartland, WSBA 37418  
1426 S. Pioneer Way  
Moses Lake, Washington 98837  
T: 509.495.1247  
F: 509.651.9430  
Email: [bpm@mcpartlandlaw.com](mailto:bpm@mcpartlandlaw.com)  
[alex@mcpartlandlaw.com](mailto:alex@mcpartlandlaw.com)

MCGEHEE, CHANG, LANDGRAF, FEILER

Jack E. McGehee  
H. C. Chang  
Benjamin T. Landgraf  
Benjamin C. Feiler  
10370 Richmond Ave., Suite 1300  
Houston, TX 77042  
T: (713) 864-4000  
F: (713) 868-9393  
Email: [jmcgehee@lawtx.com](mailto:jmcgehee@lawtx.com)  
[hcchang@lawtx.com](mailto:hcchang@lawtx.com)  
[bfeiler@lawtx.com](mailto:bfeiler@lawtx.com)  
[blandgraf@lawtx.com](mailto:blandgraf@lawtx.com)  
[jrosario@lawtx.com](mailto:jrosario@lawtx.com)

*Attorneys for Plaintiff*

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2020.

\_\_\_\_\_  
THE HONORABLE THERESA L. FRICKE  
UNITED STATES MAGISTRATE JUDGE